

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA :

-vs :

JESSIE CON-UI a/k/a "Chino," :

Defendant :

NO. 3:CR-13- 123

INDICTMENT

THE GRAND JURY CHARGES:

Count 1 (First Degree Murder)

FILED  
SCRANTON

JUN 25 2013

PER  DEPUTY CLERK

On or about the 25<sup>th</sup> day of February, 2013, at the Canaan Federal Correctional Complex, United States Penitentiary, Waymart, Pennsylvania, on land acquired for the use of the United States and under its concurrent jurisdiction, and within the Middle District of Pennsylvania and the jurisdiction of this Court, the defendant,

**JESSIE CON-UI a/k/a "Chino,"**

willfully, deliberately, maliciously, and with premeditation and malice aforethought, did unlawfully kill another person and human being, Eric Williams, by repeatedly stabbing and striking him with weapons and repeatedly kicking, stomping, and slamming him about the head, face, and torso.

All in violation of Title 18, United States Code, Sections 1111 and 7(3).

**THE GRAND JURY FURTHER CHARGES:**

**Count 2**

**(First Degree Murder of a United States Corrections Officer)**

On or about the 25<sup>th</sup> day of February, 2013, at the Canaan Federal Correctional Complex, United States Penitentiary, Waymart, Pennsylvania, and within the Middle District of Pennsylvania and the jurisdiction of this Court, the defendant,

**JESSIE CON-UI a/k/a "Chino,"**

did willfully, deliberately, maliciously, and with premeditation and malice aforethought, unlawfully kill another person and human being, United States Corrections Officer Eric Williams, while he was engaged in the performance of his official duties, by repeatedly stabbing and striking him with weapons and repeatedly kicking, stomping, and slamming him about the head, face, and torso.

All in violation of Title 18, United States Code, Sections 1114(1) and 1111.

**NOTICE OF SPECIAL FINDINGS**

**THE GRAND JURY FURTHER CHARGES THAT:**

- a. The allegations set forth in Counts 1 and 2 of this Indictment are hereby re-alleged as if fully set forth herein and incorporated by reference.
- b. As to Counts 1 and 2 of this Indictment, the defendant herein, **JESSIE CON-UI a/k/a "Chino"**:

(1) was more than 18 years old at the time of the offense.(Title 18, United States Code, Section 3591(a));

(2) intentionally killed Eric Williams. (Title 18, United States Code, Section 3591 (a)(2)(A));

(3) intentionally inflicted serious bodily injury that resulted in the death of Eric Williams. (Title 18, United States Code, Section 3591(a)(2)(B));

(4) intentionally participated in an act, contemplating that the life of a person would be taken or intending that lethal force would be used in connection with a person, other than one of the participants in the offense, and the victim died as a direct result of the act. (Title 18, United States Code, Section 3591(a)(2)(C));

(5) intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offense, such that participation in the act constituted a reckless disregard for human life and the victim died as a result of the act. (Title 18, United States Code, Section 3591(a)(2)(D));

(6) has previously been convicted of a Federal or State offense punishable by a term of imprisonment of more than 1 year, involving the use or attempted or threatened use of a Firearm (as defined in Title 18, United States Code, Section 921) against another person. (Title 18, United States Code, Section 3592(c)(2));

(7) has previously been convicted of another Federal or State offense resulting in the death of a person for which a sentence of life imprisonment or death was authorized by statute. (Title 18, United States Code, Section 3592(c)(3));

(8) committed the offense in an especially heinous, cruel or depraved manner in that it involved torture or serious physical abuse to the victim. (Title 18, United States Code, Section 3592(c)(6));

(9) committed the offense after substantial planning and premeditation to cause the death of a person. (Title 18, United States Code, Section 3592(c)(9));

(10) has previously been convicted of violating Title II or III of the Comprehensive Drug Abuse Prevention and Control Act of 1970 for which a sentence of 5 or more years may be imposed. (Title 18, United States Code, Section 3592(c)(12));

(11) committed the offense against a federal public servant who was an employee of a United States penal or correctional institution while he was engaged in the performance of his official duties. (Title 18, United States Code, Section 3592(c)(14)(D)(i)).

**THE GRAND JURY FURTHER CHARGES:**

**Count 3**

**(Possessing Contraband in Prison)**

On or about the 25<sup>th</sup> day of February, 2013, at the Canaan Federal Correctional Complex, United States Penitentiary, Waymart, Pennsylvania, and within the Middle District of Pennsylvania and the jurisdiction of this Court, the defendant,



**JESSIE CON-UI a/k/a "Chino,"**

an inmate of the Canaan Federal Correctional Complex, United States Penitentiary, Waymart, Pennsylvania, knowingly possessed a prohibited object, that is, a sharpened weapon commonly known as a "shiv" or "shank."

In violation of Title 18, United States Code, Sections 1791(a)(2), (d)(1)(B), and (b)(3).

**A TRUE BILL:**

06-25-13  
DATE

  
  
PETER J. SMITH  
United States Attorney